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12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 YER VANG,

15 Plaintiff,

16 v.

17 KILOLO KIJAKAZI,
18 Acting Commissioner of Social Security,

19 Defendant.

No. 1:22-CV-01101-SKO

STIPULATED MOTION AND ORDER FOR
AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

(Doc. 18)

20
21 The parties through their respective counsel of record, hereby request that with the Court's
22 approval, Defendant's time for responding to Plaintiff's Motion for Summary Judgment be
23 extended seven (7) days from May 30, 2023 to June 6, 2023. This is Defendant's first request for
24 an extension. Plaintiff has no objection to Defendant's request for an extension.

25 Good cause exists for this request. Defendant respectfully requests this additional time
26 because Counsel for Defendant has and will be unable to devote the time required to complete its
27 response. Counsel for Defendant is currently dealing with a heavy caseload with conflicting
28

Stipulated Motion for Extension of Time; Order

1 deadlines and Counsel will also be out of the office May 26-31, 2023. Given workload conflicts
2 and upcoming leave schedule a one-week extension until June 6, 2023 will provide an
3 opportunity for the undersigned Counsel for Defendant to prioritize completing the response to
4 Plaintiff's Motion for Summary Judgment. Counsel apologizes to the Court for any
5 inconvenience caused by this delay and does not anticipate the need for any further extensions.
6 All other dates in the Court's Scheduling Order shall be extended accordingly.

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8 Respectfully submitted,

9 PHILLIP A. TALBERT
10 United States Attorney

11 DATE: May 25, 2023

12 By: s/ Oscar Gonzalez de Llano
13 OSCAR GONZALEZ DE LLANO
14 Special Assistant United States Attorney
15 Attorneys for Defendant

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17 Respectfully submitted,

18 PEÑA & BROMBERG, PLC

19 DATE: May 25, 2023

20 By: /s/ Jonathan Peña *
21 JONATHAN PEÑA
22 Attorneys for Plaintiff
23 (*as authorized by email)

24 ORDER

25 Pursuant to Defendant's Stipulated Motion (Doc. 18), and for good cause shown (Fed. R.
26 Civ. P. 16(b)(4)), IT IS SO ORDERED that Defendant shall have an extension, up to and
27 including June 6, 2023, to respond to Plaintiff's Motion for Summary Judgment. All other
28 deadlines in the Scheduling Order (Doc. 5) are extended accordingly.

IT IS SO ORDERED.

Dated: May 30, 2023

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE